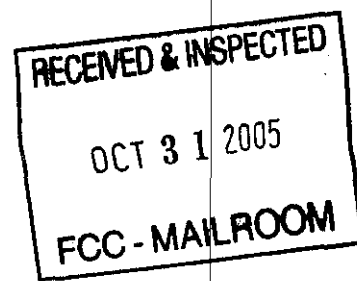


DOCKET FILE COPY ORIGINAL



Michael J Sparling
16820 Vincent Ave
Monument, CO 80132

Oct 26, 2005

Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-204B
Washington, DC 20554

Dear Secretary,

Enclosed are my unstapled, signed, two page original and 9 copies in response to the FCC Notice of Proposed Rule Making (NPRM) in WT Docket 05-235

Please distribute one copy to each commissioner.

Thank you,

A handwritten signature in cursive script that reads "Michael J Sparling".

Michael J Sparling

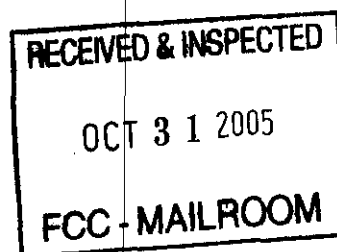
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List A B C D E

Comments Regarding NPRM, WT Docket 05-235

Michael J Sparling
16820 Vincent Ave
Monument, CO 80132

Oct 26, 2005

Commissioners
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-204B
Washington, DC 20554



Dear Commissioner,

This is in response to the FCC Notice of Proposed Rule Making (NPRM) in WT Docket 05-235 that would eliminate international Morse code telegraphy-testing requirements for all classes of amateur radio licenses.

International Morse code telegraphy is historically and traditionally unique and remains the simplest, most basic means of human language communication over radio.

Notable it is the only "digital mode" that can be mutually understood by both humans and machines. All other digital codes require special hardware to communicate, but Morse code only requires a key, an ear and the remarkable signal processing capabilities of a trained radio operator – no special hardware or software required.

Because of its simplicity, the cost to build radio equipment for it is very low, allowing operation of amateur radio even on a shoestring budget. But even with a low power transmitter, a simple receiver, a modest antenna and marginal radio propagation conditions, using international Morse code telegraphy still offers regional and worldwide HF communication opportunities when all else fails.

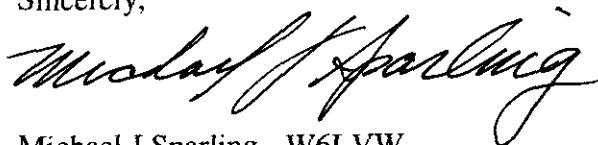
Unquestionably, international Morse code telegraphy has fundamental and enduring value to the amateur radio community, which should continue to encourage learning and using it. But to completely eliminate international Morse code telegraphy-testing requirements for all classes of amateur radio licenses would surely be a **fundamental disservice to the bases and purpose of Amateur Radio.**

If nothing else, proficiency in international Morse code telegraphy must absolutely continue to be a requirement for the Extra Class amateur radio license, where a higher level of accomplishment must be demonstrated in all aspects of the radio art. In return, Extra Class amateur radio operators are given exclusive international Morse code telegraphy operating privileges in frequency segments of the HF amateur radio bands where it is allocated. (Also, the requirement, once 20 WPM, should be raised from its current 5 WPM to at least 10 WPM.)

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List A B C D E

A reasonable accommodation would be to eliminate the international Morse code telegraphy-testing requirements for some entry-level HF operator license, while continuing to encourage the learning and using of it by the amateur radio community itself - **but the international Morse code telegraphy-testing requirements must absolutely NOT be eliminated for the Extra Class amateur radio license.**

Sincerely,

A handwritten signature in black ink, reading "Michael J Sparling". The signature is written in a cursive style with a large, stylized "M" and "S".

Michael J Sparling - W6LVW